

Exhibit 2

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Case No. 22-12055

Debtor,
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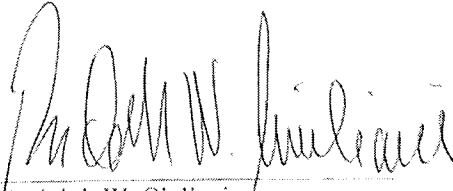
APPLICATION TO CONVERT CHAPTER 11 TO CHAPTER 7

TO: THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

Rudolph W. Giuliani, the Debtor and Debtor-in-Possession herein (the "Debtor"), by and through his attorneys, Berger, Fischhoff, Shumer, Wexler & Goodman, LLP, as and for his application to convert his Chapter 11 bankruptcy to a Chapter 7 bankruptcy, represents as follows:

1. A voluntary Chapter 11 petition was filed on December 21, 2023, a Trustee has not been appointed and the case is still pending and has not been confirmed, discharged or dismissed.
2. The Debtor wishes to convert the instant Chapter 11 case to a proceeding under Chapter 7 pursuant to Section 1112(a) of the Bankruptcy Code.

WHEREFORE, it is respectfully requested that this Chapter 11 case be converted to a proceeding under Chapter 7.


Rudolph W. Giuliani